

COHEN GREEN

October 11, 2023

Hon. Analisa Torres, U.S.D.J.
Southern District of New York
500 Pearl Street
New York, NY 10007

By Electronic Mail

Re: Case No. 23-cv-1017 (AT), Erlick v. White

Dear Judge Torres:

My firm and I represent Plaintiff Eli Erlick in this case. I write to ask the Court for a two week extension of time to file an opposition to the motion to dismiss. Defendant consents to this extension.

Per the Court's rules:

1. The original date to oppose the motion was October 13, 2023 (Dkt. No. 31).
2. Plaintiff seeks this extension because counsel needs more time to prepare the opposition. Specifically, although I had tried to clear the time to prepare this memo, among other things, I am working on a book and my full drafts of the chapters I am responsible for were due this week and last. Those deadlines have been more pressing and all-consuming than I had anticipated. I am also working on a number of other matters with non-dispositive deadlines at the end of this week and beginning of next. And finally, while, in light of the Court's Order of Dkt. No. 31, I would normally ask for a single week or perhaps 10 days, I am travelling for part of next week and would appreciate the Court's indulgence in allowing a little longer.
3. This is the first request for an extension. However, the Court denied in part Plaintiff's initial request for a longer time to oppose the motion. *See* Dkt. No. 31.
4. (see 3)
5. Defendant has graciously consented to this extension request.

As ever, I thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them



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